

1-31-85  
12.3.8 v.3



## ASH GROVE CEMENT WEST, INC.

### Inter-Office Memorandum

Date January 31, 1985

To METRO SITE TEAM MEMBERS

From Ken Rone

Dave Donaldson, Sid Brooks, George Clark & Nate Fernow

Copies to Ed Miller

Subject METRO Site Visit

Erik Voldbaek

The attached letters comprise METRO's response to our proposed mitigation (also attached) of the concerns raised during their formal site visit.

Our hats off to Dave Donaldson for seizing the opportunity to handle the visit on an informal one-on-one basis without the regulatory pomp and ceremony we had feared this may snowball into.

In turn, my sincere thanks to all of you for your willingness to serve. This brings the METRO Site Visit to a successful conclusion.

  
KJR:Imb

USEPA SF



1261122

AGC2H000666



Municipality of Metropolitan Seattle

Exchange Bldg. • 821 Second Ave., Seattle, Washington 98104

January 30, 1985

Mr. David R. Donaldson  
Maintenance Engineer  
Ash Grove Cement West, Inc.  
3801 East Marginal Way South  
Seattle, Washington 98134

Dear Mr. Donaldson:

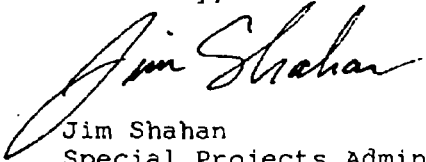
Thank you for your letter of January 25, 1985, outlining your plans to move all oil storage indoors, and to remove the coal, fly ash and slag piles from the site. We agree that sampling and analysis of runoff from these piles will be moot since their removal is imminent.

Attached for your information is a letter to the Department of Ecology encouraging the continued monitoring of your settling pond under State Waste Discharge Permit No. 5162.

These steps conclude the on-site visit procedure as agreed upon with the Duwamish Industrial Council. Metro found all other environmental concerns adequately addressed with regard to water quality of the Duwamish River. We will keep you appraised of our progress on the water quality problems as outlined in the plan.

Thank you for your interest and cooperation.

Sincerely,



Jim Shahan  
Special Projects Administrator

cc: Don Stark, Gogarty and Stark

JS:jw



Exchange Bldg. • 821 Second Ave., Seattle, Washington 98104

January 29, 1985

Mr. Gary Brugger  
Washington Department of Ecology  
4350 150th Avenue Northeast  
Redmond, Washington 98052

Dear Mr. Brugger:

As part of Metro's Duwamish Industrial Non-Point Source Investigations, the Ash Grove Cement facility at 3801 East Marginal Way South was visited and several recommendations were made regarding sampling and site improvements. The enclosed letter from David Donaldson describes the actions taken by Ash Grove to prevent possible discharge of toxicants to the Duwamish. We found the firm most cooperative and, as the letter indicates, responsive to our recommendations.

The only remaining concern is the settling pond on the southwest corner of their property. The pond is unlined and is within 50 yards of the river and could therefore contribute pollutants through groundwater discharge. A sample taken by Department of Ecology in 1983 had a copper concentration which exceeds the acute criteria. Lead and zinc were slightly below the acute criteria.

Because Ash Grove desires to maintain accountability with Department of Ecology for this facility, we recommend that Department of Ecology continue to closely monitor the pond which may be contributing heavy metals to the Duwamish through groundwater discharge.

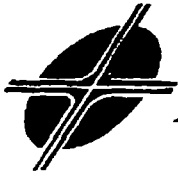
If you have any questions regarding Ash Grove, please call me at 447-6891.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Tom Hubbard", is written over the typed name.

Thomas P. Hubbard  
Water Quality Planner  
Water Resources Section

TPH:bb  
Enclosure



**ASH GROVE CEMENT WEST, INC.**

3801 EAST MARGINAL WAY, SOUTH  
SEATTLE, WA 98134  
PLANT OFFICE (206) 623-5596

January 25, 1985

Jim Shahan  
Special Projects Administrator  
METRO  
821 - 2nd Avenue  
Seattle, Washington 98104

Dear Mr. Shahan:

To resolve any question over river contamination by the situations pointed out in your October 10, 1984, tour of our facilities, we propose the following:

1. Effective February 1, 1985, all oil storage will be removed from the present oil storage dock and warehoused indoors. The oil dock will be used only for receiving purposes.
2. Effective May 1, 1985, the coal, fly ash and slag stored in open stockpiles will be removed from the site. These materials were once used in our kiln process and are no longer needed due to the curtailment of kiln operations at this facility. We feel that a costly sampling and analysis program for the stockpiled material would be moot, considering its imminent removal from the site.
3. On-site seepage of settling pond water is authorized under State Waste Discharge Permit No. 5162 and regulated by the State of Washington, Department of Ecology. Our desire is to maintain compliance with, and accountability to, DOE for settling pond conditions. DOE sampling requirements for these conditions are on record and further sampling would be duplicative.

We are confident these actions will serve to further the objectives of METRO. Please feel free to contact us on any item for which we may be of further service.

Sincerely,

David R. Donaldson  
Maintenance Engineer

DRD:lmb

cc: K. Rone  
E. Miller

bcc: Erik Voldbaek



Exchange Bldg. • 821 Second Ave., Seattle, Washington 98104

January 30, 1985

Mr. David R. Donaldson  
Maintenance Engineer  
Ash Grove Cement West, Inc.  
3801 East Marginal Way South  
Seattle, Washington 98134

Dear Mr. Donaldson:

Thank you for your letter of January 25, 1985, outlining your plans to move all oil storage indoors, and to remove the coal, fly ash and slag piles from the site. We agree that sampling and analysis of runoff from these piles will be moot since their removal is imminent.

Attached for your information is a letter to the Department of Ecology encouraging the continued monitoring of your settling pond under State Waste Discharge Permit No. 5162.

These steps conclude the on-site visit procedure as agreed upon with the Duwamish Industrial Council. Metro found all other environmental concerns adequately addressed with regard to water quality of the Duwamish River. We will keep you apprised of our progress on the water quality problems as outlined in the plan.

Thank you for your interest and cooperation,

Sincerely,

A handwritten signature in cursive script that reads "Jim Shahan".

Jim Shahan  
Special Projects Administrator

cc: Don Stark, Gogarty and Stark

JS:jw



Municipality of Metropolitan Seattle

Exchange Bldg. • 821 Second Ave., Seattle, Washington 98104

January 29, 1985

Mr. Gary Brugger  
Washington Department of Ecology  
4350 150th Avenue Northeast  
Redmond, Washington 98052

Dear Mr. ~~Brugger~~ *Brugger*:

As part of Metro's Duwamish Industrial Non-Point Source Investigations, the Ash Grove Cement facility at 3801 East Marginal Way South was visited and several recommendations were made regarding sampling and site improvements. The enclosed letter from David Donaldson describes the actions taken by Ash Grove to prevent possible discharge of toxicants to the Duwamish. We found the firm most cooperative and, as the letter indicates, responsive to our recommendations.

The only remaining concern is the settling pond on the southwest corner of their property. The pond is unlined and is within 50 yards of the river and could therefore contribute pollutants through groundwater discharge. A sample taken by Department of Ecology in 1983 had a copper concentration which exceeds the acute criteria. Lead and zinc were slightly below the acute criteria.

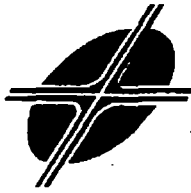
Because Ash Grove desires to maintain accountability with Department of Ecology for this facility, we recommend that Department of Ecology continue to closely monitor the pond which may be contributing heavy metals to the Duwamish through groundwater discharge.

If you have any questions regarding Ash Grove, please call me at 447-6891.

Very truly yours,

Thomas P. Hubbard  
Water Quality Planner  
Water Resources Section

TPH:bb  
Enclosure



## ASH GROVE CEMENT WEST, INC.

3801 EAST MARGINAL WAY, SOUTH  
SEATTLE, WA 98134  
PLANT OFFICE (206) 623-5596

January 25, 1985

Jim Shahan  
Special Projects Administrator  
METRO  
821 - 2nd Avenue  
Seattle, Washington 98104

Dear Mr. Shahan:

To resolve any question over river contamination by the situations pointed out in your October 10, 1984, tour of our facilities, we propose the following:

1. Effective February 1, 1985, all oil storage will be removed from the present oil storage dock and warehoused indoors. The oil dock will be used only for receiving purposes.
2. Effective May 1, 1985, the coal, fly ash and slag stored in open stockpiles will be removed from the site. These materials were once used in our kiln process and are no longer needed due to the curtailment of kiln operations at this facility. We feel that a costly sampling and analysis program for the stockpiled material would be moot, considering its imminent removal from the site.
3. On-site seepage of settling pond water is authorized under State Waste Discharge Permit No. 5162 and regulated by the State of Washington, Department of Ecology. Our desire is to maintain compliance with, and accountability to, DOE for settling pond conditions. DOE sampling requirements for these conditions are on record and further sampling would be duplicative.

We are confident these actions will serve to further the objectives of METRO. Please feel free to contact us on any item for which we may be of further service.

Sincerely,

David R. Donaldson  
Maintenance Engineer

DRD:lmb

cc: K. Rone  
E. Miller

bcc: Erik Voldbaek

AGC2H000672

EWIG.

CAROL JACOB - DOE 4/30/85  
MS MARCIA BURKE - EPA  
GUNTER SCHUBERTS - METRO FACILITIES PLANNING  
~~JOHN~~ JERI

CAROL JACOB: NEW THOUGHTS:

1) P.S.W.C.A.

2) HOUSE SELECT COMMITTEE ESTABLISHED

ELLIOT BAY ACTION PLAN... ONE OF SEVEN BAYS BEING  
STUDIED... \$2.0mm ON COMMENCEMENT BAY ALONE BY EPA.

"WE'LL NEVER GET \$24mm - SHUCKS"

PUGET SOUND INITIATIVE - \$1.6mm - OF WHICH EBAP IS PART.

General Schmitts: PHASE OUT CARRACK & WEST SEATTLE. Secondary & REHABILITATION  
AND WEST POINT. EXPAND RESTORATION. COULDN'T CHANGE UNDER WRITERS. THAT  
THEY COULD GET. FB INCREASE

SPONSOR  
JOHN ~~SCHUBERTS~~: FINANCED BY BOND RATING. EPA DENIED WAIVER FOR PUGET SOUND  
COALITION FOR CLEAN WATER - JOINS ALL SIMILAR MUNICIPALITIES  
IN STATE SO BOND SALES WILL GET APPROVED AND MAKE STATE  
A "PARTNER". LORRAINE HWE WILL SPONSOR

750 GALLONS IS CUSTOMER EQUIVALENT.

CSO. COMBINED  
SEWER  
OVERFLOW

WASTE TREATERS  
FINDLAY - I.T. CORPORATION  
KRNKSTA - CROSBY & OVERTON  
- ARLINGTON

SUPERFUND RISK - CHEM. PRO